ID: CCA\_2011083007424950 Number: **201138044** Release Date: 9/23/2011

Office:

UILC: 9999.00-00

From:

**Sent:** Tuesday, August 30, 2011 7:43:13 AM

To: Cc:

Subject: FW: Question regarding representation and delegation rights by large firms

The previous advice is still correct. A taxpayer may grant an individual representative the power to substitute or add another representative by expressly including this authority on line 5 of a Form 2848. The taxpayer, however, may not grant this authority to an entire firm. Thus, only an authorized individual representative, not a firm, can submit a new Form 2848 naming a new representative (by attaching a copy of the original Form 2848 showing that the individual representative has the authority to do so).

Please let me know if I can be of further assistance.